

REMARKS

In response to the Official Action mailed December 20, 2005, Applicants amend their application and request reconsideration. In this Amendment, claims 1, 8, 15, 22, 36, 37, 38, and 39 are amended, no claims are canceled, and claims 40-43 are added, so that claims 1-28 and claims 36-43 are now pending. Claims 40-43 are supported by the specification, for example, at page 16, line 15 to page 16, line 17 and Figure 6. No new matter has been added.

I. 35 U.S.C. § 112 Rejection of Claims

Claims 1-28 and 36-39 are rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. That rejection is respectfully traversed.

The Examiner asserts that the claimed subject matter does not reasonably convey to one skilled in the art that the inventors had possession of the invention at the time the application was filed. The Examiner directs our attention to the limitation “wherein said units are defined by an XML <envelope> tag and an XML </envelope> tag.” Applicants note that this limitation appears only in claims 7, 14, 21, 28, and 35. Thus, Applicants respectfully submit that the remaining claims are not properly rejected. Moreover, Applicants point out that this limitation was present in the original application as filed, thus the inventors clearly had possession at the time of filing. Furthermore, the allegedly unsupported limitations are clearly supported in the application at page 12, line 13 to page 13, line 14, for example, as well as Figures 1 and 11. Thus, the specification clearly describes the <envelope> tags, how units are defined by these tags, and how the tags functionally interrelate to the operation of the invention. For at least this reason, the rejection is erroneous and should be withdrawn.

The Examiner further asserts that the specification does not disclose the use of SOAP protocol. Applicants note that the use of the SOAP protocol is not claimed. It is therefore irrelevant whether Applicants disclosed use of the SOAP protocol. For at least this reason, the rejection is erroneous and should be withdrawn.

Claims 1-28 and 36-39 are rejected under 35 U.S.C. § 112, second paragraph, as failing to comply with the enablement requirement. That rejection is respectfully traversed.

The Examiner asserts that “dividing said client requests into one or more smaller units,” “wherein said units are defined by an XML <envelope> tag and an XML </envelope> tag,” is not enabled by the specification. Applicants respectfully disagree, and direct the Examiner’s attention to the specification at page 12, line 13 to page 13, line 14, for example, as well as Figures 1 and 11. One of ordinary skill in the art at the time of the invention would have been enabled by this description in the specification to “dividing said client requests into one or more smaller units,” “wherein said units are defined by an XML <envelope> tag and an XML </envelope> tag.” Accordingly, the rejection is erroneous and should be withdrawn.

II. 35 U.S.C. § 102 Anticipation Rejection of Claims

Claims 1-4, 6-11, 13-18, 20-25, 27-32, and 34-35 are rejected under 35 U.S.C. § 102(e) as being anticipated by *Jordan*, U.S. Patent Application Publication No. 2002/0069157. Applicants respectfully traverse this rejection with respect to pending claims 1-28 and 36-43.

Regarding claims 1, 8, 15, and 22, *Jordan* fails to teach every limitation of the amended claims. The Examiner contends that the limitation “placing said smaller units in a queue” is taught by *Jordan* at paragraph 346 (See Response to Arguments regarding claims 4, 11, 18, and

25 in the Official Action). This contention is erroneous, as *Jordan* fails to teach that smaller units of a request message are placed in a queue.

In *Jordan*, a message broker sends a request message to a queue, and a client retrieves the message from that queue. (See paragraph 305, last sentence, of *Jordan*). The receiving application dequeues the XML request message, and then processes it. (See paragraph 316, second sentence, of *Jordan*). That processing includes parsing the XML document, and sending the data off for analysis. (See paragraphs 258, 109, and 110 of *Jordan*). Thus, the request message is queued first, and then parsed. By contrast, claim 1, for example, is directed to a method wherein a received request message is first divided into smaller units, and then those smaller units are placed in a queue. *Jordan*'s method of queuing first, parsing later produces a different result than results using methods consistent with the present invention. For example, if multiple client requests are received, each of those client requests are queued, and the units of that request are processed together. In embodiments consistent with the present invention, the requests are first divided into units and then queued, such that units from different requests may be in the same queue.

Thus, *Jordan* fails to teach every limitation of claims 1, 8, 15, and 22. Accordingly, the rejection is erroneous and should be withdrawn.

Regarding claims 1, 8, 15, and 22, *Jordan* fails to teach "servicing said units in order." In the Response to Arguments, the Examiner merely asserts that this limitation is disclosed in paragraphs 260-265, 315-318, and 346-348. However, this does nothing to rebut Applicant's arguments that the parsed XML document objects are not placed into a queue to be serviced in order. Instead, as previously explained, the messages in the queue are serviced, and then the message is parsed into XML objects. Thus, *Jordan* may disclose servicing queued messages in

order, but it does not teach servicing the parsed XML objects in order. (See paragraphs 109, 110, 258, and 316 of *Jordan*). Accordingly, the rejection is erroneous and should be withdrawn.

Regarding claims 7, 14, 21, and 28, the Examiner relies on the term “SOAP” in paragraph 219 of *Jordan* to teach that “said units are defined by an XML <envelope> and an XML </envelope> tag.” The mere appearance of the term SOAP in that paragraph is insufficient to teach the present limitation. Even if use of the SOAP protocol is disclosed, this does not teach that the units to be divided are defined by XML envelope tags. To anticipate the claim the reference must teach every limitation. Furthermore, in the Response to Arguments, the Examiner relies on section 4 of “Simple Object Access Protocol (SOAP) 1.1” to teach the use of <envelope> tags. If the Examiner is relying on this document to support the rejection, then the claims are not properly rejected under 35 U.S.C. § 102. Accordingly, the rejection is erroneous.

Regarding claims 36-39, Applicants submit that *Jordan* fails to teach that the “units represent portions of multiple client requests.” As previously explained, *Jordan* does not teach that portions of multiple client requests are placed in the same queue. Instead, messages are queued and then parsed into units. (See paragraphs 109, 110, 258, and 316 of *Jordan*).

Regarding new claims 40-43, Applicants submit that *Jordan* fails to teach that the “the plurality of client requests are received through a plurality of sockets, and wherein the worker thread services units received through at least two of the plurality of sockets.” *Jordan* does not even discuss sockets.

III. Conclusion

In view of the above remarks, Applicants submit that all claims are allowable over the cited prior art, and respectfully requests early and favorable notification to that effect.

Respectfully submitted,

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